

REMARKS

Claim Rejections - 35 U.S.C. §112

Claims 42, 54 and 66 are rejected, under 35 U.S.C. §112, second paragraph, for allegedly insufficient antecedent basis. As such, Claims 42, 54 and 66 have been amended. As such, withdrawal of this rejection is earnestly solicited.

Claim Rejections - 35 U.S.C. §102

Claims 37-39, 41-51, 53-63 and 65-72 are rejected as being allegedly anticipated by Morgan (U.S. 5,596,698) (hereinafter "Morgan"). Applicants respectfully traverse.

Independent Claim 37 recites a limitation whereby a plurality of substantially invisible codes are printed on a surface, as claimed. Independent Claim 37 further recites determining and outputting an instructional response in response to recognizing a plurality of print elements associated with the plurality of substantially invisible codes, as claimed.

In contrast, Morgan discloses that a digitizer overlays or is incorporated in the screen and detects when and where the stylus tip touches the screen (see Morgan, col. 7, lines 52-53). Morgan further discloses that the pen input module accepts pen input from the screen/digitizer and displays "electronic ink" on the screen (see Morgan, col. 10, lines 17-20).

Accordingly, Morgan discloses a screen that includes the digitizer for detecting when and where the stylus tip touches the screen, thereby sensing and tracking what the user is writing. A sensor device (e.g., digitizer), as disclosed by Morgan, drastically differs from substantially invisible codes printed on a surface, as claimed because sensors overlay or are incorporated in the screen for sensing position and are not printed on a surface, as claimed. Moreover, sensors for tracking position, as disclosed by Morgan, differ from invisible codes, as claimed. As such, Morgan fails to either teach or suggest a plurality of substantially invisible codes printed on a surface, as claimed.

Moreover, Morgan discloses a sequence of steps performed by a student in a typical lesson (see Morgan, col. 5, lines 66-67). Morgan discloses that the “TeachPad” asks the student to solve a problem (see Morgan, col. 6, lines 4-5) and tells the student that regrouping is required by displaying graphically in several steps (see Morgan, col. 6, lines 9-11). Morgan discloses that two digits are added together and displayed and that the student is not asked to enter the sum because he is expected to mentally compute the sum (see Morgan, col. 6, lines 15-20). Accordingly, until this step no input has been entered by the user. Thus, the lesson from the “TeachPad” is not in response to the student.

Morgan further discloses that the one’s digit in the think area moves and disappears because the student is supposed to write it down (see Morgan, col. 6, lines 21-23) and that the “TeachPad” waits for the student to write it in the correct

location (see Morgan, col. 6, lines 27-34). Thereafter the process is repeated with the ten's digit (see Morgan, col. 6, lines 35-51). After the student completes the answer correctly, the "TeachPad" tells the student the answer is right (see Morgan, col. 6, lines 52-54).

Accordingly, Morgan discloses providing the student with lessons prior to any input by the student. Thereafter, Morgan discloses informing the student that the answer is correct at the end of the process when the student writes the correct answer. Thus, the only feedback in response to the student input occurs at the end of the process when the student writes the correct answer. The feedback provided at the end of the process, as disclosed by Morgan, is not an instructional response, as claimed, because it only outputs whether the student wrote the correct answer. As such, Morgan fails to either teach or suggest in response to the recognizing, determining and outputting the instructional response, as claimed.

Accordingly, Morgan fails to anticipate independent Claim 37, under 35 U.S.C. §102(b). Independent Claims 49 and 61 recite limitations similar to that of independent Claim 37 and are patentable for similar reasons. Dependent claims are patentable by virtue of their dependency.

As per Claims 48, 60 and 72, Morgan discloses a stylus that is separate from the processor (see Morgan, Figure 3). Morgan discloses that when the stylus touches and moves over the screen, the computer darkens the pixels

under the stylus (see Morgan, col. 7, lines 54-57). Accordingly, the screen digitizer is located under the stylus to detect the application of pressure and send the signal to the processor for processing (see Morgan, Figure 1). Therefore, the processor disclosed in Morgan is separate from the stylus. As such, Morgan fails to teach or suggest a writing device wherein the processor, input device, output device and writing device form a housing having a pen-like appearance, as claimed. Moreover, Morgan teaches away from the recited limitation by disclosing that the stylus and the processor are separate from one another.

As such, allowance of Claims 37-39, 41-51, 53-63 and 65-72 is earnestly solicited.

Claim Rejections - 35 U.S.C. §103

Claims 40, 52 and 64 are rejected as being allegedly unpatentable over Morgan in view of Greanias et al. (U.S. 5,007,085) (hereinafter "Greanias"). The Applicants respectfully traverse.

The rejection admits that Morgan does not disclose a stylus having an optical detector, a processor coupled to the optical detector and wherein the writing surface has a plurality of substantially invisible codes at a plurality of positions for determining a location of a plurality of different print elements on the surface, as claimed. The rejection relies on Greanias to remedy this failure. Applicants respectfully traverse.

The Applicants respectfully submit that Morgan alone or in combination with Greanias fails to teach or suggest a plurality of substantially invisible codes that are printed on a surface, as claimed. Moreover, the cited combination fails to either teach or suggest determining and outputting an instructional response in response to recognizing a plurality of print elements associated with the plurality of substantially invisible codes, as claimed.

Claims 40, 52 and 64, recite a stylus having an optical detector for detecting the plurality of substantially invisible codes printed on the surface and a memory unit comprising code for audio outputs corresponding to the print element, as claimed.

In contrast, Greanias discloses a light pen where a location of the light pen is determined by detecting the coordinates of the dot of light raster scanning of the display (see Greanias, col. 1, lines 30-36). Dot of lights as disclosed by Greanias disappear as soon as the screen display is turned off. Thus, dot of lights, as disclosed by Greanias, differ from substantially invisible codes printed on the surface, as claimed.

Moreover, Applicants have found no teaching or suggestion in Greanias that the light pen has a memory unit comprising code for audio outputs corresponding to the print element, as claimed. Furthermore, as discussed and presented above, Morgan fails to either teach or suggest a stylus having a memory unit comprising code for audio outputs, as claimed because the

processor processes the received signal which is separate from the stylus (see Morgan, Figure 1).

Accordingly, Morgan alone or in combination with Greanias fails to render Claims 40, 52 and 64 obvious, under 35 U.S.C. §103(a). As such, allowance of Claims 40, 52 and 64 is earnestly solicited.

For the above reasons, the Applicants request reconsideration and withdrawal of the rejections under 35 U.S.C. §112, 35 U.S.C. §102 and 35 U.S.C. §103.

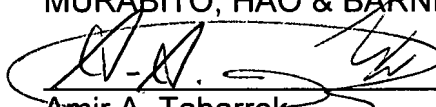
CONCLUSION

In light of the above listed remarks, reconsideration of the rejected Claims is requested. Based on the arguments presented above, it is respectfully submitted that Claims 37-72 overcome the rejections of record and, therefore, allowance of Claims 37-72 is earnestly solicited.

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